

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

RARE & FINE WATCHES AG	§	
<i>Plaintiff,</i>	§	
	§	
V.	§	CIVIL ACTION NO. 5:20-CV-00249
	§	
ROBERT MARON, INDIVIDUALLY,	§	
and ROBERT MARON, INC.,	§	
<i>Defendant.</i>	§	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§1332, 1441, and 1446, Defendants ROBERT MARON, INDIVIDUALLY and ROBERT MARON, INC, remove this action from the 73rd Judicial District Court of Bexar County, Texas to the United States District Court for the Western District of Texas, San Antonio Division.

I. NATURE OF THE ACTION

1. On January 27, 2020, Plaintiffs RARE & FINE WATCHES AG filed a lawsuit against Defendants in the 73RD Judicial District Court, Bexar County, Texas (the “State Court Action”). Plaintiff’s claims are for breach of contract, promissory estoppel, conversion and fraud.

II. BASIS FOR REMOVAL

2. The State Court Action is removable because there is complete diversity of citizenship between the parties and the alleged amount in controversy exceeds \$75,000, exclusive of interest and costs. *See* 28 U.S.C. § 1332(a).

3. Plaintiff is a Swiss corporation domiciled and doing business at Grundstrasse 12, CH-6343 Rotkreuz, Switzerland.

4. Defendant ROBERT MARON, INDIVIDUALLY is an individual who resides in and is a citizen of the State of California.

5. Defendant ROBERT MARON, INC. is a citizen of the State of California because it is a corporation organized and existing under the laws of California and its principal place of business is located in California at 2060 Avenida de Los Arboles, Suite D309, Thousand Oaks, California 91362.

6. Consequently, there is complete diversity of citizenship among the parties.

7. Plaintiff is seeking recovery of a watch that it claims has valued of at least \$1,000,000. Based upon Plaintiff's allegations, the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

8. Defendants are filing this Notice timely within 30-day time period required by 28 U.S.C. § 1446(b)(1).

9. A copy of all process, pleadings, and orders served upon Defendants is filed with this Notice.

10. For these reasons, Defendants hereby remove this action from the 73rd Judicial District Court of Bexar County, Texas to the United States District Court for the Western District of Texas, San Antonio Division.

**HORNBERGER FULLER
& GARZA INCORPORATED**
The Quarry Heights Building
7373 Broadway, Suite 300
San Antonio, Texas 78209
Tel: (210) 271-1700, Fax: (210) 271-1740

By: /s/ David Jed Williams

David Jed Williams
State Bar No. 21518060
jwilliams@hfgtx.com
Stephanie L. Curette
State Bar No. 24076780
scurette@hfgtx.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 1, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either by transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

David Lopez
dlopez@ccn-law.com
Manuel Martinez Anzaldua
mmartinez@ccn-law.com
CACHEAUX, CAVAZOS & NEWTON, L.L.P.
Convent Plaza
333 Convent Street
San Antonio, Texas 78205

/s/ David Jed Williams
David Jed Williams